

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

FIGHT FOR NEVADA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:20-cv-00837-RFB-EJY
)	
BARBARA CEGAVSKE, in her official capacity)	Judge: Hon. Richard F. Boulware, II
as the Secretary of State of Nevada,)	
)	Magistrate: Hon. Elayna J. Youchah
)	
Defendant.)	

**DECLARATION OF ROBERT E. BARNES IN SUPPORT OF PLAINTIFF'S
EMERGENCY MOTION FOR PRELIMINARY INJUNCTION AND/OR TEMPORARY
RESTRAINING ORDER**

I, Robert E. Barnes, declare as follows:

1. I am an attorney at law duly authorized to practice law before all the courts of the State of California, and I am the *pro hac vice* attorney of record for the Plaintiff in this instant case. Except where noted to the contrary, I have personal knowledge of the facts set forth in this Declaration, and if called upon to testify could do so competently based upon my own personal knowledge or information and belief.

2. Plaintiff in the instant case faces a statutory deadline for the submission of their petition for the recall of a public officer of May 14, 2020. If they are not provided emergency relief, their First and Fourteenth Amendment rights will be irreparably harmed.

3. The office address of Movant is 601 S. Figueroa St., Ste. 4050, Los Angeles, CA 90017.

4. The office address of Defendant is Nevada State Capitol Building, 101 North Carson Street, Suite 3, Carson City, NV 89701.

5. On May 11, 2020, Defendant was notified of the Complaint via an email to Mr. Greg Zunino, Deputy Attorney General. In response, Mr. Zunino reiterated the Secretary's position that she would be unable to extend the statutory deadline and that Plaintiff would need to file their Motion to obtain their requested extension. On May 12, 2020, Plaintiff agreed with Mr. Zunino that a meet and confer would be unnecessary and emailed Mr. Zunino a copy of the Motion and supporting documents.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration is executed on the 12th day of May, 2020 at Austin, Texas.

DATED: May 12, 2020

Respectfully submitted,

s/ Robert E. Barnes
Robert E. Barnes, CA SBN #235919
BARNES LAW
Pro Hac Vice Pending
601 South Figueroa Street, Suite 4050
Los Angeles, CA 90017
(310) 510-6211 – Main
(310) 510-6225 – Fax
robertbarnes@barneslawllp.com